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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 OAKLAND DIVISION
14

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.
18

19 SHENG THAO,
ANDRE JONES,
20 DAVID TRUNG DUONG, and
21 ANDY HUNG DUONG,

22 Defendants.

Case No. 25-CR-0003-YGR

STIPULATION AND ~~PROPOSED~~ ORDER TO
CONTINUE STATUS CONFERENCE FROM
JANUARY 28, 2026, TO FEBRUARY 4, 2026,
AND TO EXCLUDE TIME UNDER THE SPEEDY
TRIAL ACT THROUGH OCTOBER 19, 2026

At the status conference held on November 20, 2025, the Court set a trial date in the above-captioned case for October 19, 2026, with jury selection to commence the week before. The Court also set a scheduling conference for January 28, 2026, and ordered the parties to file proposed case schedules by January 14, 2026. Two of government counsel, however, are unavailable on January 28, 2026. Accordingly, all parties hereby stipulate and agree to continue the scheduling conference to February 4, 2026, at 10:00am and to file proposed case schedules by January 21, 2026.

At the November 20, 2025, status conference the Court also excluded time under the Speedy Trial Act through January 28, 2026, and requested that the parties file a written stipulation and proposed order excluding time through the trial date based on the need for effective preparation as well as the complexity of the case. Accordingly, the government and counsel for all defendants agree that time be excluded under the Speedy Trial Act so that defense counsel can continue to prepare, including by reviewing significant amount of discovery already produced. For this reason and as further stated on the record at the status conference, the parties stipulate and agree that excluding time until October 19, 2026, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that this case is complex within the meaning of the Speedy Trial Act due to the number of defendants and the significant amount of discovery in the case. *See* 18 U.S.C. § 3161(h)(7)(B)(ii). The parties further stipulate and agree that the ends of justice served by excluding the time from January 28, 2026, through October 19, 2026, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorneys certify that they have obtained approval from counsel for the defendants to file this stipulation and proposed order.

IT IS SO STIPULATED

CRAIG H. MISSAKIAN
United States Attorney

Dated: January 12, 2026

/s/_____
ABRAHAM FINE
MOLLY K. PRIEDEMAN
LLOYD FARNHAM
Assistant United States Attorneys

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_____/s/_____
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_____/s/_____
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Counsel for Defendant Andre Jones

_____/s/_____
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NEAL STEPHENS
JEFFREY SCHENK
Counsel for Defendant David Duong

_____/s/_____
WINSTON CHAN
DOGULAS SPRAGUE
ERIK BABCOCK
Counsel for Defendant Andy Duong

~~PROPOSED~~ ORDER

The January 28, 2026, scheduling conference is hereby continued to February 4, 2026, at 10:00am. The parties shall file proposed case schedules by January 21, 2026.

Furthermore, based upon the facts set forth in the stipulation of the parties and the representations made to the Court on November 20, 2025, and for good cause shown, the Court finds that failing to exclude the time from January 28, 2026, through October 19, 2026, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that this case is complex within the meaning of the Speedy Trial Act due to the number of defendants and the significant amount of discovery in the case. *See* 18 U.S.C. § 3161(h)(7)(B)(ii). The Court further finds that the ends of justice served by excluding the time from January 28, 2026, to October 19, 2026, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from January 28, 2026, through October 19, 2026, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(ii), (B)(iv).

IT IS SO ORDERED.

DATED: January 14, 2026


YVONNE GONZALEZ ROGERS
United States District Judge